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RECEIVED

JUN 0 9 2005

PUBLIC SERVICE COMMISSION

MS. BETH O'DONNELL EXECUTIVE DIRECTOR KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD. FRANKFORT KY 40602

Re: Response to Motion to Apply CTAT Rates to Ballard Rural

and

Motion for Expanded Scheduling Order

Ballard Rural Telephone Cooperative Corporation, Inc. v.

Jackson Purchase Energy Corporation PSC Case No. 2004-00036

Dear Ms. O'Donnell:

Please find enclosed an original and ten (10) copies of a Verified Response to Motion to Apply CTAT Rates to Ballard Rural and a Motion for Expanded Scheduling Order in the above referenced matter. I have also enclosed additional copies of both for file-stamping, which I would ask that you return to me in the enclosed self-addressed, stamped envelope.

Should you need any further information from me regarding this filing, please do not hesitate to contact me.

Respectfully,

Melissa D. Yates

Attorney for Jackson Purchase Energy Corporation

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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

JUN 0 9 2005

PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

BALLARD RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

PSC CASE NO. 2004-00036

v.

JACKSON PURCHASE ENERGY CORPORATION

## MOTION FOR EXPANDED SCHEDULING ORDER

Comes the defendant, Jackson Purchase Energy Corporation ("JPEC"), through counsel, and respectfully requests that the Commission enter an expanded scheduling order in this matter to allow Commission staff time in which to propound further data requests to the parties and in order for JPEC to retain an expert to testify as to the appropriate method for calculating the fees to be charged for attachments by Ballard Rural Telephone Cooperative Corporation, Inc., to the utility poles of JPEC. JPEC believes these steps are necessary in order to ensure that the parties are able to present all pertinent information and address all applicable issues prior to a formal hearing in this matter. The informal settlement conference held on June 1, 2005, developed a wide range of issues beyond those which initially served as the basis for this case and it is believed the newly raised issues might have statewide impact. This is evidenced by the attendance of Ron Sheets, Executive Director of the Kentucky Association of Electric Cooperatives, Inc., and by the attendance of Forest Skaggs, Executive Director of the Kentucky Telephone Association ("KTA") at the informal settlement conference. Further, Ron Sheets informally requested time for his association to investigate the issue and to consider the possibility of becoming commissioning a cost-of service rate study on behalf of the electric cooperatives in the state, which study could ultimately be useful to the Commission in deciding this case. Finally, JPEC also requests that the Commission's order contain discovery and filing deadlines, in addition to a hearing date.

Wherefore, JPEC respectfully requests that the Commission enter an Expanded Scheduling Order

in conformance with the above requests.

Respectfully Submitted,

DENTON & KEULER, LLP

P. O. Box 929

Paducah, KY 42002-0929

Tel. No.: 270-443-8253

Fax Non 270-442-6000

By David Danter

Melissa D. Yates

I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission by faxing and mailing via Federal Express to:

BETH O'DONNELL EXEC DIR PUBLIC SERVICE COMMISSION 215 SOWER BLVD P O BOX 615 FRANKFORT KY 40601

Fax: (502) 564-3460

True and correct copies of the foregoing have been mailed to:

HON ANITA MITCHELL ATTY PUBLIC SERVICE COMMISSION 215 SOWER BLVD P O BOX 615 FRANKFORT KY 40602

HON JOHN E. SELENT DINSMORE & SHOHL LLP 1400 PNC PLAZA 500 W. JEFFERSON STREET LOUISVILLE, KY 40202

on this

Aday of June, 2005.

By:

W. David Denton Melissa D. Yates